Case 5:05-cv-03649-JW

Document 167-3

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# **EXHIBIT** B



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April 26, 2007

## **VIA FACSIMILE**

Lester Levy, Esquire Michele Raphael, Esquire Wolf Popper LLP 845 Third Avenue New York, NY 10022-6601

RE: CLRB Hanson Industries, LLC, et al. v. Google, Inc. Case No. C 05-03649 JW

Dear Mr. Levy and Ms. Raphael:

Our client has completed its review of the deposition transcripts of witnesses Heather Wilburn, Shivakumar Venkataraman, and Michael Schulman. We have prepared tailored confidentiality designations for each of these transcripts. These designations are as follows:

## Wilburn transcript

Confidential-Trade Secret/Attorneys' Eyes Only - None.

Confidential — 23:22-33:12; 34:23-36:23; 37:12-39:12; 45:22-46:18; 48:21-51:6; 62:11-14; 63:18-67:13; 69:8-70:11; Exhibits 2 & 3 (The materials and issues discussed in this portion are not available to the public, and are thus, confidential).

Non-confidential — All other portions of the transcript.

### Venkataraman transcript

Confidential-Trade Secret/Attorneys' Eyes Only - None.

Confidential — Entire transcript. (All issues discussed by this Google engineer in this deposition reflect Google's internal processes and are not publicly available).

Non-confidential — None. 41063-0023/LEGAL13193088.1

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### Schulman transcript

Confidential-Trade Secret/Attorneys' Eyes Only — 48:5-15 (The issues discussed in this portion pertain to Google's business practices, and are thus, highly confidential).

Confidential — All other portions of the transcript. (All other issues discussed by this Google engineer in this deposition reflect Google's internal processes and are not publicly available).

Non-confidential - None.

We will be notifying the reporter of these designations and requesting that they prepare final transcripts on an expedited basis.

Very truly yours,

M. Christopher Jhang

cc: Ken Sorkin (via facsimile)